

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA
PHILADELPHI DIVISION**

In re: Adam B Christianson, Debtor Wells Fargo Bank, N.A., Movant v. Adam B Christianson, Debtor/Respondent KENNETH E. WEST [Chapter 13], Esq. Trustee/Respondent	Bankruptcy No. 24-10395-mdc Chapter 13 Related to Doc. No. 2
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**WELLS FARGO BANK, N.A.'S OBJECTION TO CONFIRMATION OF DEBTORS'
CHAPTER 13 PLAN**

Secured creditor, Wells Fargo Bank, N.A., (“Wells Fargo”) by and through its undersigned counsel, hereby objects to the proposed Chapter 13 Plan of Debtor, Adam B Christianson, and in support thereof alleges as follows:

1. Debtor, Adam B Christianson, (“The Debtor”), filed a voluntary petition pursuant to Chapter 13 of the Bankruptcy Code on February 7, 2024.
2. Wells Fargo holds a security interest in the Debtor’s real property located at 604 Alburger Ave, Philadelphia , PA 19115, (the “Property”), by virtue of a Mortgage recorded with the Philadelphia County, PA on October 30, 2009 in Document ID 52137557, at Page 1-10.
3. Said Mortgage secures a Note in the amount of \$186,459.00.

4. On March 29, 2024, Wells Fargo filed its Proof of Claim under the claim (6-1) in the total amount of \$184,316.70 with pre-petition arrearage of \$54,991.61. A true and correct copy of the Proof of Claim (with all supporting documents) is attached hereto as Exhibit “A.”
5. The Proof of Claim further sets forth and itemizes a pre-petition arrearage of \$54,991.61. See Exhibit “A.”
6. On February 7, 2024, Debtor filed a Chapter 13 Plan (the “Plan”). A true and correct copy of the Plan is attached hereto as Exhibit “B.”
7. The Plan does not account for the full pre-petition arrearage of \$54,991.61, as it only accounts for a total sum of \$52,050.00, that will be paid through the Plan. See Exhibit “B.”
8. Thus, the Plan is understated as it does not accurately reflect the amount of the pre-petition arrearage which will be paid through the Chapter 13 Trustee’s Office.
9. Accordingly, pursuant to 11 U.S.C.A. § 1325(a)(5) Wells Fargo, Secured Creditor hereby objects to Debtor’s proposed Plan due to the fact that the value of the property to be distributed thereunder will be less than the allowed amount under the claim. See 11 U.S.C.A. § 1325(a)(5)(B)(ii).

WHEREFORE, Wells Fargo Bank, N.A., (“Wells Fargo”), respectfully requests that this Court not confirm the Chapter 13 Plan of Debtor, Adam B Christianson.

Date: 04/15/2024

**Robertson, Anschutz, Schneid, Crane &
Partners, PLLC**

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 15, 2024, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system, and a true and correct copy has been served via CM/ECF or United States Mail to the following parties:

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United States Trustee
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Philadelphia, PA 19107

Adam B Christianson
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Date: 04/15/2024